

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Pennsylvania

United States of America )  
v. )  
ZAHFEER MANNING ) Case No. 25-mj-526  
)  
)  
)  
)  
)  
\_\_\_\_\_  
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.  
On or about the date(s) of October 2022 thru May 26, 2024 in the county of Delaware and Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. § 2261A(2)	Stalking
18 U.S.C. § 844(h)	Use of Fire in Furtherance of Another Federal Felony

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed telephonically

Date: 03/12/2025

City and state: Philadelphia, Pennsylvania

/s/ Courtney Scarpato  
Complainant's signature  
Courtney Scarpato, ATF SA  
Printed name and title

Scott W. Reid Scott W. Reid  
2025.03.13 09:50:09  
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Judge's signature  
Scott W. Reid, USMJ  
Printed name and title

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Courtney Scarpato, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I, Courtney Scarpato, am a Special Agent for the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been so employed since April 2021. I have completed the Criminal Investigator Training Program and ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Glynco, Georgia, where I received training in the investigation of federal crimes involving firearms, narcotics, arson, and explosives. I am currently assigned to ATF Philadelphia Group II, which is an Arson and Explosives Group, whose primary responsibilities include investigating federal arson and explosive offenses.
2. The information contained in this affidavit is known to me personally or has been relayed to me by other law enforcement officers, or individuals assisting law enforcement officers, as indicated below. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause to secure authorization to arrest Zahfeer MANNING, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

**PURPOSE OF AFFIDAVIT**

3. This affidavit is provided in support of a Criminal Complaint and Arrest Warrant charging Zahfeer MANNING with stalking, in violation of 18 U.S.C. § 2261A(2), and use of fire in furtherance of another federal felony, namely, stalking, in violation of 18 U.S.C. § 844(h).

4. Specifically, there is probable cause to show that from October 2022 through on or about May 26, 2024, Zahfeer MANNING engaged in a course of conduct that placed K.B. in reasonable fear of serious bodily injury or was reasonably expected to cause substantial emotional distress to her and that in furtherance of that conduct, on May 16, 2024, MANNING caused a fire at 1850 N 76<sup>th</sup> Street, Philadelphia, PA through the use of a destructive device commonly referred to as a “Molotov cocktail.”

### **FACTS ESTABLISHING PROBABLE CAUSE**

#### *History of Domestic Violence*

5. K.B.<sup>1</sup>, the mother of MANNING’s son, ended their romantic relationship in October 2022 after he became verbally abusive and demanding. Soon thereafter, MANNING began to send threatening text messages indicating that he was going to harm K.B., her family, and their child. MANNING was first arrested on domestic violence related charges in October of 2022.
6. During the investigation, investigators obtained a consensual forensic download of K.B.’s cell phone. Analysis of K.B.’s cell phone contents indicates that MANNING used more than 33 different phone numbers to send harassing messages via native text, text messaging applications and emails, including direct threats of death since at least October 2022. Examples of the threats communicated to K.B. in October and November 2022 include “*open the f\*\*king door bitch*” ... “*or I swear I’m a kick this shit tf down on my grand pop*” ... “*Watch ou wanna be slime I’m a set that bitch on fire while sleep bitch*”.

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<sup>1</sup> K.B. is a person who is known to law enforcement and have been interviewed in connection with this investigation. K.B. is providing information to law enforcement as a victim to a crime and not in anticipation of receiving any compensation or consideration in connection with any criminal matter. K.B. is believed to be truthful and credible as aspects of K.B.’s information have been independently verified by this investigation. K.B. is referred to by initials as a means of protection given the violent nature of the crimes at issues in this investigation.

Additional messages from various phone numbers included *“ima shoot you in ya fu\*\*ing face bitch f\*\*k around and pistol whip ya hoe ass”*; and *“Disrespectful ass bitch I’m blow ya fu\*\*ing mom crib up and shoot you ya son and that mf in face bitch”*.

7. The threatening messages continued through 2023 and into 2024. Examples of the threats communicated to K.B. during this time include *“Y’all bouta be homeless bitch”* ... *“Get ready to go to the Red Cross”* (believed to refer to the Red Cross House, a facility in West Philadelphia which temporarily houses fire victims). *“Your house going up next lil whore”*. (sent four days after K.B.’s car was set on fire<sup>2</sup>). *“Watch bitch I’m kill you”* and *“I’m beat you tf up bitch f\*\*king whore”* ... *“be ready for tomorrow bitch”* ... *“you better buy your gun tomorrow too bitch”*.
8. Early in the morning on March 12, 2024, MANNING broke a front window at K.B.’s house and continued to send threatening text messages. That same day, K.B. obtained a Temporary Protection From Abuse Order (PFA). In the coming days, MANNING continued to send threats via text message including *“now I see I gotta come to your job”* ... *“I seen you and your mom”* ... *“watch tonight bitch”* ... *“your whole house going up in flames”* ... *“Ima throw ah fire bomb thru that window now bitch”* ... *“Watch this bitch f\*\*king whore ima fire bomb both entrance so yall gotta jump out the f\*\*king window”*. MANNING also sent photographs of street signs in close proximity to K.B.’s house during these barrages of text message threats. On March 17, 2024, another window was broken at K.B.’s house. K.B. was interviewed by a Philadelphia Police detective and provided copies of text messages and call logs showing numerous attempts to contact K.B.

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<sup>2</sup> K.B.’s car, which was parked about one block from her house was burned during the overnight hours of September 4, 202. The Philadelphia Fire Marshal’s Office investigated and determined that the fire was *incendiary*, meaning it was intentionally set. K.B.’s car was destroyed in the fire, and a second car parked nearby belonging to an unrelated person was also damaged.

The detective sought and was granted an arrest warrant for MANNING for violation of the Temporary PFA.

9. The text threats continued with messages in April 2024, including “*watxh this ima bouta pay ah smoka \$300 to set that bitch on (fire emoji)*” and “*f\*\*kbya son bitch he should’ve died when ate that glass bitch*” (referring to previous messages where K.B. informed MANNING that glass from a broken window had landed on K.B. and MANNING’s son). Messages from various phone numbers also included additional threats referencing the use of fire as a weapon such as “*the whole crib thing up flames tonight bitch stay tryna insult my intelligence but watch*” and “*im bouta set this bitch on fire*”.
10. On April 26, 2024, MANNING was stopped by Delaware River Port Authority Police on an unrelated matter and was arrested on the PFA violation warrant. MANNING remained in custody until May 6, 2024, before being released. The text messages and phone calls from MANNING to K.B. resumed on May 7, 2024.
11. MANNING and K.B. continued to exchange text messages concerning their son following MANNING’s prison release. On May 9, 2024, MANNING transmitted a message saying, “*yall both die together bitch*”.

***Firebombing at 1850 N 76<sup>th</sup> Street***

12. On May 16, 2024, at approximately 12:02 a.m., K.B. called 911 to report that MANNING was sending threats. At 1:34 a.m., K.B. again called 911 to report that MANNING had sent her a text message indicating that he was in K.B.’s neighborhood.
13. At approximately 1:57 a.m., a surveillance camera on the rear of K.B.’s residence captured a male, believed to be MANNING, approaching the rear of the house with an

object later to be determined to be a destructive device<sup>3</sup>, commonly known as a Molotov Cocktail in his right hand. The male lit the Molotov as he approached the rear of the house, and the camera recording stopped as the male continued to approach with the Molotov.

14. K.B.'s uncle, A.M.<sup>4</sup>, was sitting in a vehicle parked on the side of the house guarding it in response to the threats received from MANNING. A.M. stated to investigators that he did not see the man he believed to be MANNING approach from the rear of his car but did see him with the Molotov cocktail in his hand. A.M. observed the male throwing the Molotov cocktail at the back wall of the house and observed the flames spreading across the wall when the Molotov broke apart on impact with the brick wall. A.M. exited his vehicle and moved toward the male, who ran south down the alley behind the row of houses.
15. Your affiant reviewed ATF reports along with Philadelphia Police and Fire Department reports which revealed that on May 16, 2024, at approximately 1:57 a.m., the Philadelphia Fire Department was dispatched to 1850 N. 76<sup>th</sup> Street in Philadelphia, Pennsylvania for a report of a structure fire. Arriving firefighters found a fire in the rear of the property which had self-extinguished prior to their arrival. The rear of the property sustained damage from the heat of the fire and soot deposition.
16. At the scene, investigators recovered sections of a glass Everfresh juice bottle and a cloth wick, determined to be components of an improvised incendiary device / destructive

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<sup>3</sup> An ATF Explosives Enforcement Officer has examined the remains of the device and has determined that it is a destructive device as set forth in Title 26, United States Code, Section 5845.

<sup>4</sup> A.M. is a person who is known to law enforcement and have been interviewed in connection with this investigation. A.M. is providing information to law enforcement as a witness to a crime and not in anticipation of receiving any compensation or consideration in connection with any criminal matter. K.B. is believed to be truthful and credible as aspects of A.M.'s information have been independently verified by this investigation. A.M. is referred to by initials as a means of protection given the violent nature of the crimes at issues in this investigation.

device (Molotov Cocktail). DNA testing of the Molotov did not identify any profiles suitable for comparison. Ignitable liquid testing of the wick revealed the presence of gasoline.

17. K.B. identified phone number 267-254-1391, from which she had received threats the night of the fire, as belonging to MANNING. Location data, including Cellular Site location and Historical Precision Location Information which provided longitude and latitude coordinates of the handset was obtained pursuant to a Pennsylvania search warrant. Analysis of the handset location data showed the phone close to K.B.'s home at the time of the firebombing. The phone associated with this phone number was recovered at MANNING's home at 6034 Spruce Street in Philadelphia following his arrest on state charges approximately two weeks after the firebombing. Additional phones associated with text messages and threats, some outlined in this affidavit, were also recovered at MANNING's home at the time of his arrest.

18. About 35 minutes after the firebombing, K.B. began receiving messages from phone number 215-653-1857, which is a Pinger / TextFree Voice Over Internet Protocol (VoIP) account registered to "Zahfeer Manning" with email address <zahfeerm764@gmail.com>. The message read, *"Ik you ah rat lol law enforcement around but just know real ni\*\*as always come out on top lol tell em catch me if they can playa"*.

19. Over the course of the next several days, the stalking continued via threatening text messages from various phone numbers, including messages stating, *"Omm bro is I see you walk into that court building tomorrow ima beat you tf up"* (referring to a court date related to the Temporary PFA); *"I swear bitch if you don't come forward and tell me you*

*wassup your whole family gone die yo” ... “tell your folks burning the worse way to die bitch lol and I’m watch as y’all burn Ina fire to lol” ... “tell your flks wake up and get ready call the fire department playa” ... “Let me tell you this lol one of my dad friends right doing 3 life sentences for killing his bm and the child and her mom by throwing ah fire bomb in they crib how many people in your crib 6 right os that mean I’m do ah life sentence for every last one of y’all” ... “Y’all bouta have to go to the red cross lol on 40<sup>th</sup> Lancaster” and “Great day to the light the fu\*\*ing neighborhood Up bitch I’m tired of playing these games with you (KB’s first name) on (child’s name) life”.*

20. Analysis of K.B.’s phone and the phones recovered from MANNING’s residence revealed that the mobile phone applications TextFree, TextMe and TextNow had been used by MANNING to communicate threats from varying phone numbers throughout the course of the harassing actions. These applications allow the user to assign a telephone number within the application which may differ than the telephone number assigned to the handset by the cellular service provider. Messages and calls made from within the application will appear to come from the phone number generated in the application as opposed to the traditional phone number assigned to the handset. These applications also allow a user to communicate via text and phone call over wireless networks when the handset does not have cellular service activated. In total, more than 30 different phone numbers were used to communicate threats to K.B.. Through conversations and emails with representatives from TextFree, TextMe and TextNow, investigators determined that all three applications utilize Amazon Web Services (AWS) servers located outside the Commonwealth of Pennsylvania to operate their communication networks.

### **CONCLUSION**



Based on the above information and my training and experience as an ATF special agent, I believe there is probable cause to arrest Zahfeer MANNING for stalking in violation of 18 U.S.C. § 2261A(2) and using fire in furtherance of another federal felony, namely, stalking, in violation of 18 U.S.C. § 844(h).

Respectfully submitted,

/s Courtney Scarpato  
Courtney Scarpato  
ATF Special Agent

Subscribed and sworn telephonically before me this \_\_\_\_ day of March, 2025,

**Scott** Scott W. Reid  
**W. Reid** 2025.03.12  
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HONORABLE SCOTT W. REID  
United States Magistrate Judge